

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE
TATE, JEREMY S. MELTON, ESTATE OF ISSACCA
POWELL, KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN, and KIMBERLY ALLEN on
behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

BILL OLDHAM, in his individual capacity as former Sheriff of Shelby County, Tennessee; FLOYD BONNER, JR., in his official capacity as Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity as former Jail Director of Shelby County, Tennessee; KIRK FIELDS, in his official capacity as Jail Director of Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity as former Assistant Chief of Jail Security of Shelby County, Tennessee; REGINALD HUBBARD, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity as former Assistant Chief of Jail Programs of Shelby County, Tennessee; TIFFANY WARD in her official capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; TYLER TECHNOLOGIES, INC., a foreign corporation; GLOBAL TEL*LINK CORPORATION, a foreign corporation; SOFTWARE AG USA, INC., a foreign corporation; and SIERRA-CEDAR, INC., a foreign corporation, SIERRA SYSTEMS GROUP, INC., a foreign corporation.

DEFENDANTS.

**Case No. 2:16-cv-2907-
SHM/tmp**

**CLASS ACTION
COMPLAINT FOR
VIOLATIONS OF THE
CIVIL RIGHTS ACT OF
1871, 42 U.S.C. § 1983,
TENNESSEE COMMON
LAW, DECLARATORY, AND
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R.
CIV. PRO. 38(a) & (b)**

NOTICE OF CHANGE OF LAW FIRM AND ADDRESS

Please take notice that Brice M. Timmons has moved his law practice from Black McLaren Jones Ryland & Griffiee, PC to Donati Law, PLLC effective November 2, 2020.

Brice M. Timmons
Donati Law, PLLC
1545 Union Ave.
Memphis, Tennessee 38104
(901) 278-1004 ext. 207
(901) 278-3111 facsimile
(800) 521-0578 toll free
brice@donatilaw.com

Respectfully submitted,

/s/ Brice M. Timmons
Brice M. Timmons (#29582)
DONATI LAW, PLLC
1545 UNION AVE.
MEMPHIS, TENNESSEE 38104
(901) 278-1004, EXT. 221
(901) 278-3111 FACSIMILE
BRICE@DONATILAW.COM

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing has been filed via the Court's ECF system this 2nd day of November, 2020, for service on all persons registered in connection with this case, including:

Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
Meghan Cox, Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, Tennessee 38120
(901) 537-1000
rcraddock@wyattfirm.com
ohorton@wyattfirm.com
mcox@wyattfirm.com
*Counsel for Defendants Bill Oldham,
Robert Moore, Charlene McGhee,
Debra Hammons, and Shelby County, Tennessee*

Emmett Lee Whitwell, Esq.
SHELBY COUNTY ATTORNEY'S OFFICE
160 N. Main Street, Ste 950
Memphis, Tennessee 38103
(901) 222-2100
Lee.whitwell@shelbycountyttn.gov
*Counsel for Defendants Bill Oldham,
Robert Moore, Charlene McGhee,
Debra Hammons, and Shelby County, Tennessee*

Bradley E. Trammell, Esq.
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
(901) 577-2121
btrammell@bakerdonelson.com
Counsel for Tyler Technologies, Inc.

Beth Bivans Petronio, Esq.
K & L GATES, LLP
1717 Main Street, Suite 2800
Dallas, Texas 75201
(214) 939-5815
Beth.petronio@klgates.com
Counsel for Tyler Technologies, Inc.

Russell B. Bundren, Esq.
James L. Murphy, Esq.
BRADLEY ARANT OULT CUMMINGS, LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37210
bbundren@babco.com
jmurphy@bradley.com
*Counsel for Defendant Global Tel*Link
Corporation*

Douglas F. Halijan, Esq.
William D. Irvine, Esq.
BURCH PORTER & JOHNSON, PLLC
130 N. Court Avenue
Memphis, Tennessee 38103
(901)-524-5000
dhalijan@bpjlaw.com
wirvine@bpjlaw.com
Counsel for Defendant, Software AG USA, Inc.

Kevin D. Bernstein, Esq.
Albert G. McLean, Esq.
SPICER RUDSTROM, PLLC
119 s. Main Street, Suite 700
Memphis, Tennessee 38103
kbernstein@spicerfirm.com
amclean@spicerfirm.com
Counsel for Defendant Sierra-Cedar, Inc.

Robert A. McLean, Esq.
Garrett M. Estep, Esq.
FARRIS BOBANGO BRANAN, PLC
999 S. Shad Grove Road, Suite 500
Memphis, Tennessee 38120
(901) 259-7100
rmclean@farris-law.com
gestep@farris-law.com
Counsel for Defendant Tetrus Corp.

Heather Gwinn Pabon, Esq.
GORDON REES SCULLY MANSUKHANI
222 Second Avenue South, Suite 1700
Nashville, Tennessee 37210
(615-772-9010)
Counsel for Defendant Sierra Systems Group, Inc.

/s/Brice M. Timmons